

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

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MICHAEL A. LEE, JR.,

Plaintiff,

v.

Case No. 2:22-CV-00930

GINA AMBASAN,

Defendant.

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**ANSWER AND AFFIRMATIVE DEFENSES**

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Now come the above-named defendant, Gina Ambasan, by her attorneys, Devine Hahn, S.C., and answer the complaint of the plaintiff as follows:

**JURISDICTION AND VENUE**

1. In answering paragraph #1 of the plaintiff's complaint, this answering defendant admits the allegations contained therein.

2. In answering paragraph #2 of the plaintiff's complaint, this answering defendant admits the allegations contained therein.

3. In answering paragraph #3 of the plaintiff's complaint, this answering defendant admits the allegations contained therein.

**PARTIES/PLAINTIFF**

4. In answering paragraph #4 of the plaintiff's complaint, this answering defendant admits the allegations contained therein.

### **DEFENDANTS**

5. In answering paragraph #5 of the plaintiff's complaint, this answering defendant admits the allegations contained therein.

6. In answering paragraph #6 of the plaintiff's complaint, this answering defendant admits the allegations contained therein.

7. In answering paragraph #7 of the plaintiff's complaint, this answering defendant admits the allegations contained therein.

8. In answering paragraph #8 of the plaintiff's complaint, this answering defendant admits the allegations contained therein.

### **STATEMENT OF FACTS**

9. In answering paragraph #9 of the plaintiff's complaint, this answering defendant denies the allegations contained therein.

10. In answering paragraph #10 of the plaintiff's complaint, this answering defendant denies the allegations contained therein.

### **FACTUAL ALLEGATIONS**

11. In answering paragraph #11 of the plaintiff's complaint, this answering defendant admits the allegations contained therein.

12. In answering paragraph #12 of the plaintiff's complaint, this answering defendant admits the allegations contained therein.

13. In answering paragraph #13 of the plaintiff's complaint, this answering defendant admits the allegations contained therein.

14. In answering paragraph #14 of the plaintiff's complaint, this answering defendant admits the allegations contained therein.

15. In answering paragraph #15 of the plaintiff's complaint, this answering defendant denies the allegations contained therein.

16. In answering paragraph #16 of the plaintiff's complaint, this answering defendant denies the allegations contained therein.

17. In answering paragraph #17 of the plaintiff's complaint, this answering defendant denies the allegations contained therein.

18. In answering paragraph #18 of the plaintiff's complaint, this answering defendant denies the allegations contained therein.

19. In answering paragraph #19 of the plaintiff's complaint, this answering defendant denies the allegations contained therein.

20. In answering paragraph #20 of the plaintiff's complaint, this answering defendant denies the allegations contained therein.

21. In answering paragraph #21 of the plaintiff's complaint, this answering defendant denies the allegations contained therein.

22. In answering paragraph #22 of the plaintiff's complaint, this answering defendant denies the allegations contained therein.

23. In answering paragraph #23 of the plaintiff's complaint, this answering defendant denies the allegations contained therein.

24. In answering paragraph #24 of the plaintiff's complaint, this answering defendant denies the allegations contained therein.

25. In answering paragraph #25 of the plaintiff's complaint, this answering defendant denies the allegations contained therein.

26. In answering paragraph #26 of the plaintiff's complaint, this answering defendant denies the allegations contained therein.

27. In answering paragraph #27 of the plaintiff's complaint, this answering defendant denies the allegations contained therein.

### **AFFIRMATIVE DEFENSES**

Now and for their affirmative defenses in this matter, this answering defendant alleges as follows:

1. That the statute of limitations has run on the claims made by the plaintiff.

WHEREFORE, this answering defendant demands judgment as follows:

1. Dismissing plaintiff's complaint and all claims associated therewith;
2. For costs and disbursements incurred herein;
3. For such other relief as the court deems just.

Dated April 12, 2023.

DEVINE HAHN, S.C.

By:

s/ Thomas M. Devine

Thomas M. Devine, I.D. No. 1017536

Attorneys for Defendant,

Gina Ambasan

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